Preliminary Determination on the Permit Revision Request Application of

DaikyoNishikawa USA, Inc. (DNUS)

Huntsville, Alabama

7-08-P391-Z408

ON SITE PARTNER (OSP-4): Plastic Shop
(Touch-Up Coating Booths (Units OSP-4-SMTUB and OSP-4-PPTUB))

Natural Resources and Environmental Management
City of Huntsville
320 Fountain Circle SW
Huntsville, AL 35801

August 2021

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INTRODUCTION:

A Prevention of Significant Deterioration of Air Quality Permit revision application (DNUS Revision Request #1) was received from DaikyoNishikawa USA, Inc., (DNUS) by the City of Huntsville Department of Natural Resources and Environmental Management (DNREM or "Department") on March 12, 2021, for the addition of two (2) touch-up coating booths to be installed at a currently permitted facility on a motor vehicle assembly campus located at 9000 Greenbrier Parkway NW, Unit #95, Huntsville, Limestone County, AL 35756, approximately four (4) miles west of the Huntsville, Alabama, airport. The company is an "On Site Provider" (OSP) to a joint venture (JV) between Mazda Motor Corporation and Toyota Motor Corporation (MTMUS), and is one of several support entities/facilities located on property under common control that will wholly make parts for MTMUS ("MTMUS Campus"). The Campus is under initial construction, and production operations on Campus are anticipated to begin in the Fall of 2021.

PERMITTING HISTORY:

INITIAL PERMITTING (PERMITS ISSUED DECEMBER 2018)

The original permitting effort resulted in twenty-two (22) Prevention of Significant Deterioration (PSD) of Air Quality Permits being issued for the various operations to be conducted to facilitate the production of automobiles on the MTMUS Campus, including parts pressing/stamping, parts/body welding, injection molding, painting/coating, component/body assembly, tire assembly, miscellaneous natural gas fired combustion equipment (HVAC), and emergency equipment. Seven (7) of the original twenty-two (22) permits are held by DNUS. For regulatory applicability purposes, the MTMUS Campus (i.e., the MTMUS JV facility, DNUS, and the other non-MTMUS facilities located on site under common property control) is considered one major stationary emission source for the purposes of PSD applicability and any required Best Available Control Technology (BACT) or air quality impact analyses performed.

In the initial permitting process, the MTMUS Campus was deemed a major source under PSD since the potential emissions of volatile organic compounds (VOCs - ozone) was greater than 250 TPY. Particulate matter (PM), carbon monoxide (CO), and nitrogen oxides (NO_x) potential emissions were also estimated to exceed the 10 TPY ($PM_{2.5}$), 100 TPY, and 40 TPY de minimis levels, respectively. (See Table 1 in this document for the originally permitted potential emissions for the MTMUS Campus). Therefore, Best Available Control Technologies (BACT) were required to be installed/implemented on all significant sources of VOCs, PM, CO, NO_x, and greenhouse gases (GHGs), in accordance with the City of Huntsville Air Pollution Control Rules and Regulations (COHRAR) Section 3.5.4. Therefore, all significant sources of these pollutants underwent BACT analysis, and limitations and good work practices were incorporated into the campus-wide permits.

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In accordance with the City of Huntsville Air Pollution Control Rules and Regulations (COHRAR) Section 3.5.5 through 3.5.9., an ambient air impact analysis was performed and submitted with the initial application for construction, and the impact of the facility on air quality, visibility, soils, and vegetation was assessed. The predicted ambient impacts of the source were projected to be in the immediate area of the source and were relatively minor, so no discernible impacts are expected. As the plant will be located less than 100 km (at 58.6 km) from the nearest Class I area (Sipsey Wilderness in northwest Alabama), the facility was also evaluated to determine if it would adversely affect visibility in this area in accordance with the City of Huntsville Air Pollution Control Rules and Regulations (COHRAR) Section 3.5.10. Preliminary reports from the Federal Land Manager (FLM) indicated there was no need for further evaluation.

Since the original permitting effort in December of 2018, two (2) revision requests for the MTMUS Campus as a whole have been processed (MTMUS Campus Revision Request #1 and MTMUS Campus Revision Request #2). The JV facility has had one (1) revision request that has been processed (submitted as Revision Request #3 and documented with DNREM as JV Revision Request #1). This current revision request submitted by DNUS is documented as DNUS Revision Request #1.

MTMUS CAMPUS REVISION REQUEST #1 (PERMITS ISSUED NOVEMBER 2019)

As a result of the MTMUS Campus Revision Request #1, one (1) permit covering proposed miscellaneous natural gas fire combustion sources to be operated by DNUS and five (5) other permits covering the same for the JV facility and several other OSPs were revised and issued in November of 2019. This revision required reevaluation of NO_x BACT limits due to vendor inability to meet the originally permitted 0.05 lb NO_x/MMBtu for the HVAC units.

It should be noted that the NO_x BACT limitation for all HVAC units across the Campus was updated from 0.05 lb NO_x/MMBtu to 0.06 lb NO_x/MMBtu; however, the number of HVAC units and respective burner ratings across the Campus were updated based on more refined plant/building engineering design. DNREM reviewed the proposed BACT limitation revision for the HVAC burners against the RACT, BACT, LAER Clearinghouse (RBLC) and concurred that the requested change was BACT for this equipment. Regardless of the increase in the NOx limitation, Campus-wide emissions did not increase due to this change because the Campus-wide HVAC heat input decreased. Therefore, there was no significant change in potential NO_x emissions from the Campus, and the potential emissions from all other regulated air pollutants from the Campus decreased. (See Table 1 in this document for the change in Campus-wide emissions from the original permitting effort due to MTMUS Revision Request #1). Due to potential emissions of regulated air pollutants either remaining essentially unchanged or decreasing across the Campus, a revised air quality impact analysis was not required to be performed and submitted with the MTMUS Campus Revision Request #1.

MTMUS CAMPUS REVISION REQUEST #2 (PERMITS ISSUED JULY 2020)

As a result of the MTMUS Campus Revision Request #2, one (1) permit covering operations to be conducted by DNUS and eight (8) other permits for operations to be conducted by the JV facility and several other OSPs were revised, and four (4) new permits were issued to several other OSPs in July of 2020. The revision to the permit covering DNUS operations resulted from the proposed addition of a jig cleaning operation, which included a new natural-gas burner.

It should be noted that the four (4) new permits issued to several other OSPs were the result of reassigning responsibility of emergency equipment and one (1) HVAC source from the JV facility to the OSPs. There was no increase in production or change in operations associated with these permits. The revised JV facility permits were a result in proposed increased usage of an already permitted sealer material, correction of an initially permitted BACT limit associated with an offline repair touch-up booth material, addition of a replacement parts operation using a sealer material, change in heat inputs and BACT limits (due to vendor inability to meet the originally permitted rates) for some of the natural gas process equipment, updating of power ratings for some emergency equipment and the addition of natural gas-fired emergency generators, and a decrease in vehicle fluid storage capacity. The revisions to the OSP permits, including that for DNUS as described above, included the relocation of one (1) HVAC unit from the roof to the ground and the addition of a cooling tower, shot blasting operation, and jig cleaning operation. (See Table 1 in this document for the change in Campus-wide emissions from the original permitting effort due to MTMUS Revision Request #2). Due to an increase in VOC emissions on the Campus not related to DNUS, an updated ozone impact analysis was performed and showed a minimal effect on ambient ozone levels. Due to potential emissions of all other regulated air pollutants either remaining essentially unchanged or decreasing across the Campus, a revised air quality impact analysis was not required to be performed and submitted with the MTMUS Campus Revision Request #2.

JV REVISION REQUEST #1 (submitted as "Air Permit(s) Revision Request #3"; PERMITS ISSUED AUGUST 2021)

On November 16, 2020, MTMUS applied for revisions to several of the JV facility permits under "Air Permit(s) Revision Request #3." In order to track the various applications and distinguish between the Campus-wide applications, those affecting just the JV facility, and those associated with individual OSPs only, DNREM has renamed this application "JV Revision Request #1," as it is the first application submitted for the JV facility only and no future revision applications covering more than one entity are expected. Therefore, the proposed revisions in JV Revision Request #1 do not affect any of the permits held by DNUS or the other OSPs. An air quality impact evaluation was not required for these changes, as there was no significant increase in potential emissions of criteria pollutants. However, Table 1 in this document includes changes in Campus-wide emissions proposed by JV Revision Request #1.

Engineering Analysis

DAIKYONISHIKAWA USA, INC. (DNUS)
Permit No. 7-08-P391-Z408

CURRENT PROPOSED REVISIONS:

DNUS Revision Request #1 requests issuance of one (1) new permit for two (2) touch-up coating booths to be located in the DNUS facility for applying touch-up coatings to repair parts produced by the slush molding and plastic parts manufacturing processes. The booths will utilize an air-drying process; therefore, there are no associated combustion sources. The proposed materials to be used are free of Hazardous Air Pollutants (HAPs); therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (Subpart PPPP) does not apply. As proposed, the attached Draft Permit states that any future additions or changes to the coating or cleaning materials to be used in this operation will be evaluated by DNUS and the Department prior to being used.

Table 1 in this document shows the Campus-wide potential emissions tracking from the original permitting effort through the emissions resulting from prior/proposed revisions, and the proposed changes in this revision for DNUS.

BACT EVALUATION REQUIREMENTS:

For DNUS Revision Request #1, VOC and PM BACT were evaluated for the touch-up coating booths. The proposed increase in Campus-wide VOC and PM emissions can be seen in Table 1 of this document under DNUS Revision Request #1. Enclosed booths with a dry filtration system and good VOC work practices will be utilized for the touch-up coating booths.

AIR QUALITY IMPACT ANALYSIS REQUIREMENTS:

With regard to the proposed changes in this revision, an air quality impact evaluation was not required to be performed at this time for PM10/PM2.5 since there was no significant increase of potential emissions of these pollutants.

It should be noted that it was required in the initial permitting process for the Campus that a full revised air quality impact analysis reflecting as-built building and stack parameters, as well as final anticipated potential emissions for all applicable pollutants, be performed and submitted for approval to the DNREM prior to start of operations on the Campus. This as-built air quality impact analysis has been submitted and is currently under review by DNREM. As the addition of the touch-up booths at DNUS will result in a potential increase of VOC emissions of 11.5 tons/year, an ozone impact analysis was performed and showed no significant effect on ambient ozone levels.

SUMMARY:

Engineering Analysis

DAIKYONISHIKAWA USA, INC. (DNUS)
Permit No. 7-08-P391-Z408

The PSD revision application (DNUS Revision Request #1) requesting the addition of two (2) touch-up coating booths at the DNUS facility located on a motor vehicle assembly campus in Huntsville, Limestone County, Alabama (the "MTMUS Campus"), and which would require issuance of a new Air Permit to construct and operate for DNUS, currently meets the following criteria:

1. BACT has been evaluated for the emission source additions for all regulated pollutants where BACT controls or work practice standards are proposed.

2. Due to an 11.5 ton/year increase in VOC emissions, an ozone impact analysis was performed and showed no significant ambient impact. Also, there is no predicted exceedance of the ozone National Ambient Air Quality Standards (NAAQS) or adverse impacts to human health or the environment based on ambient air quality modeling or SIL analyses performed with the initial permitting of the Campus or subsequent SIL analysis performed with prior Campus-wide individual facility revisions affecting the Campus. NOTE: As mentioned above, upon determination of final design specifications for the entire Campus, an updated full air quality impact evaluation was performed based on the final design specifications and permitted emissions and was submitted to DNREM for review prior to the changes proposed in DNUS Revision Request #1. DNREM is currently in the process of reviewing this evaluation.

DNREM concurs with DNUS's determination that the proposed changes with regard to DNUS Revision Request #1 will not change the previously demonstrated impact on the surrounding air quality as presented in the original permitting process. The regulatory authority's review of the RACT/BACT/LAER Clearinghouse (RBLC) also concurs with DNUS's determination that the revised/proposed emission controls and/or work practices are BACT for the affected emission sources. It is recommended that a PSD Air Permit with the permit provisos in the attached Draft Permit Section be issued to DNUS as part of the MTMUS Campus since all applicable regulations would be met. Permit fees totaling $7070.00 were billed at the time of public notification of this permitting action.

TABLES

TABLE 1
MTMUS CAMPUS-WIDE EMISSIONS TRACKING

	Originally Permitted Campus-Wide Emissions (TPY) (1)	Revision Request #1 Campus-Wide Change in Emissions (TPY) (2)	Revision Request #1 Campus-Wide Emissions (TPY)	Revision Request #2 Campus-Wide Change in Emissions (TPY)	Revision Request #2 Campus-Wide Emissions (TPY) (3)	JV Facility Revision Request #1 (4) Change in Emissions (TPY) (5)	JV Facility Revision Request #1 (4) Campus-Wide Emissions (TPY)	DNUS Revision Request #1 Change in Emissions (TPY)	DNUS Revision Request #1 Campus-Wide Emissions (TPY)
PM/PM10/PM2.5	11.46	-0.19	11.27	-0.03	11.24	0.2	11.44	0.16	11.6
SO_2	4.22	-0.21	4.01	-0.86	3.15	0.12	3.27	0	3.27
NO_x	264.91	0.02	264.93	-35.38	229.55	-1.5	228.05	0	228.05
CO	422.67	-29.87	392.8	-72.23	320.57	-6.5	314.07	0	314.07
O_3 (VOCs)	2322.26	-1.96	2320.3	72.25	2392.55	-0.4	2392.15	11.5	2403.65

(1) Taken from Table 2-37c in "MTMUS tables rev 120318.pdf" - amendment to the October 2018 Initial Application.

(2) Taken from Table 2-6c in "MTMUS RevAmend 09272019.xls" - final amendment to the June 2019 Revision Request #1 Application.

(3) Taken from Table 2-14a in "Revised Revision 2 Emissions (06212021).xlsx" - correction for final emission numbers. Tables were not updated at the time several changes were revoked by MTMUS during the public comment period for the 2019 Revision Request #2 Application.

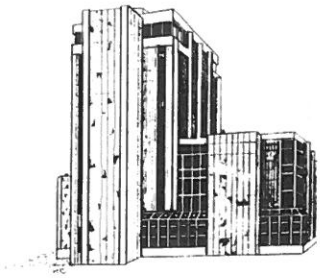
(4) "JV Facility Revision Request #1" was submitted as "MTMUS Revision Request #3." As this application was strictly for the JV facility operations, it has been renamed for tracking purposes.

(5) Taken from Table 2-8 in "MTMUS Emissions Amendment #3 (02192021).xlsx" - final amendment to the November 2020 JV Revision Request #1 (formerly "MTMUS Revision Request #3) Application.

Table 2a: PM BACT Evaluation			
EMISSION POINT/UNIT	**PERMITTED BACT**	**PROPOSED BACT**	**CONTROL DEVICE**
OSP-4-SMTUB & OSP-4-PPTUB. Plastic Shop (Touch-Up Coating Booths (Permit Z408)	N/A – New Source	Enclosed booths with dry filtration	Dry Filters

Table 2b: VOC BACT Evaluation			
EMISSION POINT/UNIT (CHANGE)	**PERMITTED BACT**	**PROPOSED BACT**	**CONTROL DEVICE**
OSP-4-SMTUB & OSP-4-PPTUB. Plastic Shop (Touch-Up Coating Booths (Permit Z408)	N/A – New Source	Good VOC Work Practices	No Control

DRAFT PERMIT



CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: DaikyoNishikawa USA, Inc. (DNUS)

Location: 9000 Greenbrier Parkway NW, Unit #95

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z408	ON SITE PARTNER (OSP-4): Plastic Shop Toyota Line Touch-Up Coating Booths (Unit OSP-4-SMTUB, OSP-4-PPTUB)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: **DRAFT**

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
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DaikyoNishikawa USA, Inc. (DNUS)
9000 Greenbrier Parkway NW, Unit #95
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission standards.

2. This unit is subject to the opacity emission rate limits.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit OSP-4-SMTUB and Unit OSP-4-PPTUB) shall not exceed 11.5 tons per year (TPY) in any consecutive rolling 12-month period.

2. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

3. VOC BACT: This source shall utilize good work practices that are practically and economically feasible that reasonably minimize coating materials and clean-up/purge/general solvent usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers.

4. No Hazardous Air Pollutant-(HAP)-containing materials shall be used in the touch-up coating booths and associated operations. Any future additions or changes to the coating or cleaning materials to be used in this operation will be evaluated by DNUS and the Department prior to being used.

III.C. Compliance and Performance Test Methods and Procedures

1. The VOC content by weight of each material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or an alternative method approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

2. The HAP content by weight of each material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance.

3. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

4. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements in addition to those listed below.

2. The dry filtration system(s) for this unit(s) shall be inspected for proper operation twice weekly. The manufacturer's suggested rates for the control equipment shall be used to determine proper control device operation.

3. Whenever maintenance checks required in proviso III.D.2 are out of normal operational range, corrective action to minimize emissions shall be taken within 48 hours, followed by an additional maintenance check(s) to confirm that emissions are reduced to normal.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) The type, quantity in gallons, and weight in pounds of each VOC-containing material used during each calendar month.

(B) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(C) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(D) Compliance with VOC limits shall be based upon monthly material use inventories and demonstrated destruction efficiency of the thermal oxidizers. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(E) Complete inventories of the VOC containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(F) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.

(G) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

(H) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(I) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. A log book or electronic records of the twice weekly maintenance checks required in proviso III.D.2 shall be retained for at least five years and available for inspection upon request. This log book or electronic records should also include the nature and date of any maintenance actions taken to correct maintenance episodes as required in III.D.3.